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World Radiocommunication Conference

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General Comment

Concerning the proposed secondary amateur service allocation at 630 meters (472 to 478 kHz), NPRM 15-50 para. 171, I offer the following information for FCC's consideration:

A station operating under experimental license WD2XSH/12 has been in use since late 2006. The station has accumulated over 38,000 hours of operation with no interference issues, including to/from the local power company (Xcel Energy). The station is located 600 meters from the main power line serving the town of Nederland Colorado. The EIRP from the station has been from 1 to 2 watts based on antenna current measurements and antenna modeling software (Numerical Electromagnetic Code). Transmission modes include both CW and BPSK-31.

Experimental activities included two-way contacts between my station and other stations of similar capabilities throughout the continental US. Reception experiments were conducted within the ground wave coverage of my station. I have no access to a calibrated field strength meter but reliable BPSK 31 reception (very low bit error rates) was noted over the rugged mountainous terrain surrounding my station to distances of more than 20 miles using a portable receiver and ferrite rod antenna. Another reception experiment was conducted during the daytime to nighttime propagation transition at a distance of over 100 miles. Low bit error rates were noted except during occasional deep signal fades.

Based on the interference free record of station WD2XSH/12, the FCC is urged to consider liberal rules concerning separation between amateur 630m stations and the local power line assets. Interference concerns might be satisfied by imposing EIRP limits based on both distance and transmit antenna characteristics.